

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

In re:	§	
	§	
BLUE MATRIX LABS, LLC,	§	CASE NO. 15-52977
HYDRO TOYS, LLC,	§	CASE NO. 15-52978
PARADISE BEVERAGE, LLC,	§	CASE NO. 15-52980
SHAGS, LLC, and	§	CASE NO. 15-52981
PARADISE BEVERAGE LOGISTICS, LLC,	§	CASE NO. 15-52979
	§	
Debtors.	§	Chapter 11
	§	(Joint Administration Requested)

**MOTION FOR JOINT ADMINISTRATION OF CASES**

**A Request for Expedited Hearing Has Been Filed**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors-in possession (collectively, the “**Debtors**”) file this Motion for Joint Administration of Cases, as follows:

1. On December 4, 2015, each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code. The Debtors are operating their business as debtors-in-possession, and no trustee or examiner has been appointed.

2. The Court has jurisdiction and authority over this matter pursuant to 28 U.S.C. §§ 157 & 1334.

3. By this Motion, the Debtors seek entry of an order authorizing and directing the joint administration of these cases under *In re Blue Matrix Labs, LLC*, Case No. 15-52977.

4. Bankruptcy Rule 1015(b) authorizes this Court to enter an order directing the joint administration of these cases. Hydro Toys, LLC, Paradise Beverage LLC, Paradise Beverage Logistics LLC, and Shags, LLC are all wholly owned subsidiaries of Blue Matrix Labs, LLC (“**Blue Matrix**”). Blue Matrix is a holding company and directed the business operations of its

various subsidiaries, each of which are confronting their own operational and business issues.<sup>1</sup>

Debtors believe that to some degree there will be some similar issues between the entities.

5. Joint administration of these cases is appropriate under the circumstances and will aid in the efficient administration of the cases. The joint administration will save time and expense by making it unnecessary to file duplicate motions and conduct duplicate hearings. Moreover, the reduction in costs from joint administration will enhance the estates, thereby benefiting all creditors.

6. Debtors further request that: (a) the Clerk of the Court maintain one docket for all pleadings filed in this case; (b) the Clerk of the Court maintain one service list for the service of the pleadings, orders, and notices in these cases; and (c) all pleadings and other papers be under filed under one case number.

7. Notwithstanding the foregoing, the Clerk of the Court should maintain a separate claims register or claims file for each case.

**WHEREFORE**, Debtors request that the Court issue the proposed order attached hereto directing the joint administration of the cases under *In re Blue Matrix Labs, LLC*, Case No. 15-52977; and that the Court grant such other and further relief as to which they may show themselves justly entitled.

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<sup>1</sup> This should not be read as admission that any corporate formalities were not observed or that corporate separateness was not strictly maintained. Debtors do not request substantive consolidation and make no concessions herein that have any bearing on that issue.

DATED: December 5, 2015  
Austin, Texas

Respectfully submitted,

TAUBE SUMMERS HARRISON TAYLOR  
MEINZER BROWN LLP

By: /s/ Christopher G. Bradley  
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PROPOSED ATTORNEYS FOR DEBTOR

**CERTIFICATE OF SERVICE**

The foregoing notice was served on all persons on the attached Service List via First Class Mail on December 7, 2015.

/s/ Christopher G. Bradley  
Morris D. Weiss

ALL CREDITORS FOR THE 5 CASES:  
**SERVICE LIST**

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